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**EXPERIMENTAL TREATMENT FACILITY REMOVAL
ACTION, RESPONSES TO COMMENTS**

11-26-91



Department of Energy
Fernald Environmental Management Project
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NOV 26 1991

DOE-225-92

Mr. James A. Saric, Remedial Project Director
U. S. Environmental Protection Agency
Region V - 5HR-12
230 South Dearborn Street
Chicago, Illinois 60604

Mr. Graham E. Mitchell, DOE Coordinator
Ohio Environmental Protection Agency
40 South Main Street
Dayton, Ohio 45402-2086

Dear Mr. Saric and Mr. Mitchell:

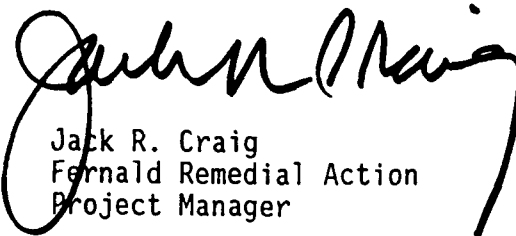
EXPERIMENTAL TREATMENT FACILITY REMOVAL ACTION, RESPONSES TO COMMENTS

Enclosed are responses to comments from the U.S. EPA and Ohio EPA on the Experimental Treatment Facility Removal Action Work Plan and the revised Work Plan. These responses were discussed in teleconferences with the U.S. EPA and Ohio EPA representatives, on November 21 and 22, 1991.

Your expedited review and approval are requested to facilitate the initiation of this removal action in mid-December.

If you or your staff has any questions, please contact Oba Vincent at FTS 774-6937 or (513) 738-6937.

Sincerely,


Jack R. Craig
Fernald Remedial Action
Project Manager

FO:Vincent

Enclosures: As Stated

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cc w/encls.:

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**PIT 5 EXPERIMENTAL TREATMENT FACILITY
REMOVAL ACTION WORK PLAN**

COMMENT RESOLUTION

U.S.EPA

GENERAL COMMENTS

COMMENT 1.

The work plan for the Experimental Treatment Facility (ETF) removal action does not provide sufficient information to illustrate that it will meet the objectives of the ongoing remedial investigation/feasibility study (RI/FS). Additional information is needed concerning the laboratories conducting the analysis, disposition of waste materials, and sampling and analysis.

Response

The additional information requested is included in the Sampling and Analysis Plan.

Resolution

Refer to Sections 2.3 and 2.4 of the Work Plan and the Sampling and Analysis Plan.

COMMENT 2.

The work plan should include the preparation and submittal of a removal action report to EPA. This report should include a description of all field activities, document all samples collected and chain-of-custody procedures, analytical results, and present conclusions and recommendations.

Response

A Removal Action Report will be developed and submitted to EPA and will include data as identified following the completion of the removal action.

Resolution

Reference Section 9 of the Work Plan.

COMMENT 3.

Several sections of the work plan state that the containers will be properly marked and labelled. This description is vague, and more specific information should be provided by either detailed description or by attaching an appropriate standard operating procedure (SOP).

Response

All containers will be marked and labelled in accordance with FEMP procedures for radiological wastes and appropriate markings and labels for RCRA Hazardous Waste. These markings and labels are identified and incorporated into Section 4.2.11.

Resolution

Refer to Section 4.2.11 of the Work Plan.

COMMENT 4.

Several sections of the work plan state that the containers will be transported to a RCRA storage area. Section 4.2.10 states that the RCRA storage area will be in compliance with 40 CFR 264. The work plan needs to provide additional specific information on how the drums will be stored. In addition, 40 CFR 264 does not include the storage of radioactive waste in its scope. Additional regulations and DOE orders that describe how this "mixed waste" will be stored should be referenced.

Response

All containerized wastes will be stored on the Plant 1 Pad which is an identified RCRA storage area. Per the Consent Decree and 40 CFR Part 264, requirements will be implemented to include the management and inspection of the containers being stored.

Resolution

Refer to Section 4.2.12 of the Work Plan.

COMMENT 5.

The work plan does not provide specific information concerning the number of samples to be collected from each media (waste materials, underlying soils, ETF structural material). The sampling plan should provide a table which estimates, for each media, the number of investigative samples, number of quality assurance samples, analytical data quality level, and required analysis.

Response

This information has been incorporated into the Sampling and Analysis Plan.

Resolution

Refer to Section 2.0 of the Sampling and Analysis Plan.

SPECIFIC COMMENTS**COMMENT 5.**

Page 9, Section 2.3: Data Chem Laboratories is not included in the list of laboratories approved in the Quality Assurance Project Plan (QAPjP) or in DOE's letter dated October 31, 1991, requesting approval of additional laboratories. The work plan should provide information concerning the type of analysis to be performed by the laboratories and the analytical data quality level required.

Response

Data Chem Laboratories is included on the list of approved laboratories in the Quality Assurance Project Plan (QAPjP), as was discussed in the conference call.

Resolution

Data Chem Laboratories will remain in Section 2.3 of the Work Plan.

COMMENT 6.

Page 10, Section 2.4: This section states that vegetation surrounding ETF will be surveyed using field instrumentation. However, the sampling plan section of this work plan does not address field surveying either vegetation or soils. The sampling plan should be revised to include field screening of both media and a detailed description of field activities.

Response

This information has been included in the Sampling and Analysis Plan.

Resolution

Refer to Section 2.2 of the Sampling and Analysis Plan.

COMMENT 7.

Page 14, Section 4.2.5: The work plan states that vegetation will be disposed of in accordance with SOP #FMPC-720 "control of construction waste." This SOP should either be described or attached to the work plan.

Response

FMPC Policy and Procedure #720 has been superseded by WEMCO Site Operating Requirement (IN-6015) entitled "Disposition Requirements for Radiological and Uncontaminated Construction-/Maintenance Waste." A copy of this procedure will be provided under separate cover.

Resolution

A copy of this procedure is being provided under separate cover.

COMMENT 8.

Page 15, Section 4.2.6(f): The work plan does not include monitoring for dust emissions during this phase of the removal action. The work plan should either justify why monitoring is not necessary or provide information on how it will be conducted.

Response

Air monitoring for fugitive emissions has been included in the Health and Safety Plan.

Resolution

Refer to Section 5.0 of the Health and Safety Plan.

COMMENT 9.

Page 15, Section 4.2.6(g): Specific information on how representative samples will be collected should be provided.

Response

The collection of representative samples of the waste residues and the ETF structure has been incorporated into the Sampling and Analysis Plan.

Resolution

Refer to Section 2.2 of the Sampling and Analysis Plan.

COMMENT 10.

Page 16, Section 4.2.9: The work plan should include specific references for decontamination procedures to be used. This should include decontamination of sampling equipment, decontamination location, and specific decontamination procedures.

Response

Decontamination procedures are included in the Health and Safety Plan. The location of the decontamination area is identified on the attached diagram.

Resolution

Refer to Section 11.0 of the Health and Safety Plan.

COMMENT 11.

Page 17, Section 5.0: The work plan should specify the number and location of samples to be collected and analyzed. The rationale for the number and location should also be clearly provided.

Response

This information is included in the Sampling and Analysis Plan. Exact sampling locations are to be included in the detailed drawings and will be provided as available.

Resolution

Refer to Section 2.0 of the Sampling and Analysis Plan.

COMMENT 12.

Page 17, Section 5.0: The work plan should clearly present the rationale for determining if and when additional samples may be necessary.

Response

There will be no additional sampling required to support this removal action.

Resolution

All references to additional sampling have been deleted from the text.

COMMENT 13.

Page 17, Section 5.0: Toxicity characteristic leaching procedure (TCLP) analysis should be included to provide information for final disposition of waste materials and soils.

Response

This information has been incorporated into the Sampling and Analysis Plan.

Resolution

Refer to Section 2.3 of the Sampling and Analysis Plan.

**PIT 5 EXPERIMENTAL TREATMENT FACILITY
REMOVAL ACTION WORK PLAN**

COMMENT RESOLUTION

OHIO EPA

REMEDIAL RESPONSE COMMENTS

COMMENT 1.

Section 2.1, pg. 2: The narrative should discuss the amendment to the consent agreement, especially because this removal action was designated in the amendment.

Response

A statement has been incorporated indicating that this removal action is included in the amended consent agreement.

Resolution

Refer to Section 2.1 of the Work Plan.

COMMENT 2.

Section 2.1, pg. 6: Include in this section an estimated of the volume of mixed waste, which will be containerized/generated by this removal action. Discuss the availability of RCRA storage capacity for this material.

Response

Information regarding quantities expected to be generated has been incorporated into Section 2.4. Storage location has also been identified in Section 2.4. The following estimates of wastes have been incorporated:

- approximately 110 cubic yards of filter media and waste residues, and
- approximately 15 cubic yards of ETF waste debris, etc.

The storage of these containers in the RCRA area has been identified as the Plant 1 Pad.

Resolution

Refer to Section 2.4 of the Work Plan.

COMMENT 3.

Section 2.1, pg. 6, par. 2: This section refers to the wood retaining walls. Figure 3, pg. 7 refers to concrete panel forms. Clarify the figure or text so that readers will understand that the walls are wood.

Response

A clarification regarding the sidewall construction has been incorporated into Section 2.1. Briefly, the sidewalls of the ETF are constructed of wood panel forms generally used in the concrete industry.

Resolution

Refer to Section 2.1 of the Work Plan.

COMMENT 4.

Section 4.2: Describe a specific procedure for suppressing airborne contamination during cutting of pipes and wood.

Response

There will be no power tools utilized in the demolition of the ETF structure or its ancillary equipment, therefore eliminating the potential for airborne contaminants. General air monitoring will be conducted during the removal action to document air emissions as discussed in the Health and Safety Plan.

Resolution

Refer to Section 4.2.6(e) of the Work Plan and the Health and Safety Plan.

COMMENT 5.

Section 4.2.5, pg. 14: Does the FMPC Site Policy and Procedures #720 include vegetation as a form of construction debris? If not, review the policy to determine if it would be applicable to vegetation.

Response

FMPC Policy and Procedure #720 has been superseded by WEMCO Site Operating Requirement (IN-6015) entitled "Disposition Requirements for Radiological and Uncontaminated Construction-Maintenance Waste." A copy of this procedure will be provided under separate cover.

Resolution

A copy of this procedure will be provided under separate cover.

COMMENT 6.

Section 4.2.6, pg. 14: The work plan should include figures to show how material will be removed and where exclusion and packaging zone will be located.

Response

A description of the removal process is discussed in Section 4.2.6(d). Detailed figures indicating the exclusion zone etc. will be provided when available. A preliminary figure/diagram indicating general work areas is attached.

Resolution

Refer to Section 4.2.6(d) of the Work Plan and the attached preliminary sketch.

COMMENT 7.

Section 4.2.6e, pg. 15: The section should discuss how piping connecting the ETF to the waste Pit 5, if it exists, will be removed.

Response

There is no piping connecting the ETF to Waste Pit 5. A discussion of the collection sump has been incorporated into Section 4.2.6.

Resolution

Refer to Section 4.2.6(g) of the Work Plan for a description of the collection sump that was discussed during the conference call.

COMMENT 8a.

Section 5.0, pg. 17: This section is grossly inadequate and must include more detail. The section fails to discuss sample numbers, location of the samples, or the circumstances which will result in additional sampling requirements. This information must be included in the revised version of this work plan.

Response

This information has been included in the Sampling and Analysis Plan. Detailed drawings to be provided when available.

Resolution

Refer to Section 2.0 of the Sampling and Analysis Plan.

COMMENT 8b.

Section 5.0, pg. 17: The soil samples should be analyzed for the full suite of inorganic constituents detected at above background concentration in waste Pit 5, as listed in table E-2 of the Treatability Study Work Plan for OU1. Additional organic constituents which should be analyzed are PCBs and phthalates.

Response

Analytical parameters are identified in the Sampling and Analysis Plan.

Resolution

Refer to Section 2.3 of the Sampling and Analysis Plan.

COMMENT 8c.

Section 5.0, pg. 17: The section must include air monitoring sampling to determine fugitive emissions, which may result from this removal action. At a minimum, the same suite of sampling being conducted for the waste Pit 5 liner repair should be conducted during this removal action.

Response

General air monitoring for fugitive emissions will be conducted during the removal action activities and is included in the Health and Safety Plan.

Resolution

Refer to Section 5.0 of the Health and Safety Plan.

RCRA COMMENTS**GENERAL COMMENT**

Within the most recent U.S. DOE-FEMP Part A application submitted as part of the RCRA permitting process, the facility identified the ETF as a Hazardous Waste Management Unit (HWMU). As such, the ETF is subject to RCRA closure requirements.

The RAWP (Section 0.0, Executive Summary) states that closure information is provided which is consistent with RCRA, however, this document does not represent a RCRA closure plan, nor is the information presented at a level of detail consistent with that required for an approvable closure plan.

Pursuant to RCRA regulations, the facility will be required to submit a closure plan to the Director of OEPA. The facility will receive official correspondence concerning closure requirements at a later date.

Subsequent comments concerning the RAWP should not be construed as official comments in response to a closure plan.

Response

The closure requirements will be determined based on the acceptance or denial of DOE's request to remove the ETF from the HWMU list.

Resolution

Discussions continue regarding the determination of the ETF as a HWMU.

SPECIFIC COMMENTS

SECTION 0.0 EXECUTIVE SUMMARY

COMMENT 1.

O.O, pg. 2: This section should indicate how the closure performance standard is to be met. Indicate the type of closure activity chosen to meet the performance standard (clean closure, closure-in-place, closure by risk assessment), and a statement of contingent activity should remediation efforts fail to meet the closure performance standard.

Response

The closure performance standard for this CERCLA removal action will be based on risk. The closure requirements will be determined based on the acceptance or denial of DOE's request to remove the ETF from the HWMU list.

Resolution

Discussions continue regarding the determination of the ETF as a HWMU and applicable closure requirements.

SECTION 2.0 BACKGROUND

COMMENT 2.

2.1, pg. 6: The background information should include an estimate of the quantity of waste (sludge, filter media, and liner, and structural components) expected to be generated by the ETF removal.

Response

Information regarding quantities expected to be generated has been incorporated into Section 2.4. Storage location has also been identified in Section 2.4. The following estimates of wastes were incorporated:

- approximately 110 cubic yards of filter media and waste residues, and
- approximately 15 cubic yards of ETF waste debris, etc.

The storage of these containers in the RCRA area has been identified as the Plant 1 Pad.

Resolution

Refer to Section 2.4 of the Work Plan.

SECTION 4.0 IMPLEMENTATION OF REMOVAL ACTION

COMMENT 3.

4.2.6(a), pg. 14: The plan should describe in greater detail those control measures to be employed to contain any spillage of waste materials when the end of the ETF is removed.

Response

Detailed drawings are being developed and will be provided as available. Liners and berms will be installed in all areas to contain the spillage of waste materials as discussed in Section 4.2.6. A preliminary diagram has been attached to these comments.

Resolution

Refer to Section 4.2.6 of the Work Plan and the attached preliminary sketch.

COMMENT 4.

4.2.6 and 4.2.7: Referenced RCRA storage areas that are to be utilized for container storage should be identified.

Response

The storage of these containers in the RCRA area has been identified as the Plant 1 Pad as discussed in Section 2.4.

Resolution

Refer to Section 2.4 of the Work Plan.

COMMENT 5.

4.2.6(h), pg. 15 and 4.2.7(b), pg. 16: These sections should be expanded to describe the methodology employed to collect representative samples of the containerized wastes.

Response

The collection of representative samples of the waste residues and the ETF structure has been incorporated into the Sampling and Analysis Plan.

Resolution

Refer to Section 2.2 of the Sampling and Analysis Plan.

COMMENT 6.

4.2.6 and 4.2.7: The plan should account for methods to control potential contamination from run-on/run-off during 2nd, 3rd, and 4th phases of the work activity.

Response

Detailed drawings are being developed and will be provided as available. Berms will be constructed around the entire work area to prevent run-on/run-off as described in Section 4.2.6 (a). A preliminary diagram has been attached to these comments.

Resolution

Refer to Section 4.2.6(a) of the Work Plan and the attached preliminary sketch.

COMMENT 7.

4.2.9, pg.16: Site policies and procedures referenced in regard to decontamination methods should be identified and incorporated within the plan. This section should include a list of large equipment, vehicles, and personal protective equipment, if any, to be decontaminated.

Response

Decontamination procedures are discussed in the Health and Safety Plan. Exact equipment to be utilized will be identified in the detailed information.

Resolution

Refer to Section 11.0 of the Health and Safety Plan.

SECTION 5.0 SAMPLING AND ANALYSIS**COMMENT 8.**

5.0, pg. 17: This section does not adequately address sampling and analytical concerns necessary to meet the closure performance standard. The section should be expanded to detail methodology employed to determine the extent of potential vertical and horizontal soil contamination and contaminant concentrations. The sampling and analysis plan should include the following information and rationale for each selection:

- * Parameters to be analyzed;
- * Number of samples and locations;
- * Background samples;
- * Sample type;
- * Sampling methods and equipment;
- * Analytical methods;
- * Evidence of a QA/QC plan for lab analysis;
- * A clear statement of clean levels for soil and rinseate; and
- * QA/QC procedure for field methods.

Reference information concerning sampling and analytical guidelines is available (DHWM Closure Plan Review Guidance Document).

Response

Sampling and analysis of the waste materials and the surface soils is included in the Sampling and Analysis Plan including the QA/QC information. General air monitoring will be conducted during the removal action to document air emissions and has been included in the Health and Safety Plan.

Resolution

Refer to the Sampling and Analysis Plan.

SECTION 6.0 HEALTH AND SAFETY**COMMENT 9.**

6.0, pg. 18: The referenced Health and Safety Plan developed for this project should be included as part of this submittal.

Response

A Health and Safety Plan is included.

Resolution

Refer to the Health and Safety Plan.

